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February 25, 2008

Marlene H. Dortch, Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW Suite TW-A325 Washington, D.C. 20554

Re: EB Docket No. 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007

Scott County Telephone Cooperative Scott County Long Distance, Inc.

Form 499 Filer ID 804426 Form 499 Filer ID 821648

Dear Ms. Dortch:

On behalf of Scott County Telephone Cooperative and its subsidiary, Scott County Long Distance, Inc., and pursuant to Section 64.2009(e) of FCC rules, there is submitted herewith the carriers' 2007 CPNI certification with accompanying statement. The documents are submitted in accordance with the directives set forth in the FCC's *Public Notice*, DA 08-171, EB Docket No. 06-36, released January 29, 2008.

Should any questions arise regarding this submission, please contact the undersigned

Very truly yours,

Pamela L. Gist

Enclosures

cc: Enforcement Bureau, FCC (2)

Best Copy and Printing, Inc. (1)

## Annual 47 C.F.R. § 64.2009(e) CPNI Certification EB Docket No. 06-36

Annual 47 C.F.R. § 64.2009(e) CPNI Certification for 2007

Company Name: Scott County Telephone Cooperative

Form 499 Filer ID: 804426

Subsidiary: Scott County Long Distance, Inc.

Form 499 Filer ID: 821648

#### CERTIFICATION

I, Daniel Odom, hereby certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures effective during the calendar year 2007 that are adequate to ensure compliance with the Customer Proprietary Network Information rules set forth in 47 C.F.R. §§ 64.2001 *et seq.* of the rules of the Federal Communications Commission.

Attached to this certification is an accompanying statement that (i) explains how the company's procedures ensure that the company is in compliance with the requirements set forth in 47 C.F.R. §§ 64.2001 et seq. of the rules, (ii) explains any actions taken against data brokers during the past year, (iii) reports information known to the company regarding tactics pretexters may be using to attempt access to CPNI, and (iv) summarizes any customer complaints received in the past year concerning the unauthorized release of CPNI.

Hanile E. Colom
Name: Daniel Odom

Title: Chief Financial Officer

Date: 03/25/08

#### 2007 STATEMENT

### Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket No. 06-36

Company Name: Scott County Telephone Cooperative

Subsidiary: Scott County Long Distance, Inc.

Address: P.O. Box 487

149 Woodland Street Gate City, Virginia 24251

#### STATEMENT

Scott County Telephone Cooperative and its subsidiaries ("Carrier") has established operating procedures that ensure compliance with the Federal Communication Commission ("Commission") regulations regarding the protection of customer proprietary network information ("CPNI").

- Carrier has implemented a system whereby the status of a customer's CPNI approval can be determined prior to the use of CPNI.
- Carrier continually educates and trains its employees regarding the appropriate use of CPNI. Carrier has established disciplinary procedures should an employee violate the CPNI procedures established by Carrier.
- Carrier maintains a record of its and its affiliates' sales and marketing campaigns that use its customers' CPNI. Carrier also maintains a record of any and all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI. The record includes a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as a part of the campaign.
- Carrier has established a supervisory review process regarding compliance with the CPNI
  rules with respect to outbound marketing situations and maintains records of carrier
  compliance for a minimum period of one year. Specifically, Carrier's sales personnel
  obtain supervisory approval of any proposed outbound marketing request for customer
  approval regarding its CPNI, and a process ensures that opt-out elections are recorded
  and followed.

- Carrier has implemented procedures to properly authenticate customers prior to disclosing CPNI over the telephone, at Carrier's retail locations or otherwise and in connection with these procedures, Carrier has established a system of passwords and back-up authentication methods which complies with the requirements of applicable Commission rules.
- Carrier has established procedures to ensure that customers will be immediately notified
  of account changes including changes to passwords, back-up means of authentication for
  lost or forgotten passwords, or address of record.
- Carrier has established procedures to notify law enforcement and customer(s) of unauthorized disclosure of CPNI in accordance with FCC timelines.
- Carrier took no following actions against data brokers in 2007, including proceedings instituted or petitions filed by Carrier at a state commission, in the court system, or at the Federal Communications Commission.
- Carrier has no information with respect to the processes pretexters are using to attempt to access CPNI, nor of what steps carriers are taking to protect CPNI.
- Carrier received no customer complaints in 2007 regarding the unauthorized release of CPNI in any category (improper access by employees, improper disclosure to individuals not authorized to receive the information, improper access to online information by individuals not authorized to view the information, or other instances of improper access or disclosure.